

1:19 MJ 9220

**AFFIDAVIT**

Your Affiant, Joseph J. Zevchek, being duly sworn, deposes and states:

1. Your Affiant, Joseph J. Zevchek is an officer or employee of the United States Department of Justice (DOJ), Drug Enforcement Administration (DEA) within the meaning of Section 878(a) of Title 21, United States Code, that is an officer who is empowered by law to conduct investigations, make arrests, and seize property for violations of Title 18, United States Code and Title 21, United States Code.
2. Your Affiant is a Special Agent for the United States Department of Justice, Drug Enforcement Administration (DEA), and has been so employed since October 2015. During your Affiant's employment with the DEA, your Affiant has been assigned to the Cleveland District Office (CDO) in Cleveland, Ohio since August 2018, and prior to that the Cincinnati, Ohio Resident Office.

**TRAINING AND EXPERIENCE**

3. Your Affiant has been involved in the investigation of various individuals and organizations involved in the manufacturing, distribution, and use of controlled substances. Your Affiant has conducted surveillance



operations and has become familiar with the methods used by individuals engaged in the manufacturing, trafficking, and use of controlled substances. Your Affiant received specialized training at the DEA training facility located at the FBI Academy in Quantico, Virginia in regards to the identification of narcotic substances and the operation of drug trafficking organizations (DTO). Your Affiant is currently assigned to the DEA Cleveland District Office Heroin Enforcement Group. Affiant has conducted and/or participated in numerous drug investigations and operations which resulted in the arrest(s) and conviction(s) of numerous drug traffickers in both state and federal prosecutions and the seizure of significant quantities of drugs and drug related proceeds.

#### **PROBABLE CAUSE**

4. On June 18, 2019, agents with DEA obtained a court order authorizing the interception of wire communications over (216) 415-2719 (TT-1), known to be used by Cortez COLLINS. Interception began on June 19<sup>th</sup>. The order authorizing interception was renewed on July 18, 2019, to include authorization to



intercept electronic communications. Agents intercepted the last call over TT-1 on July 29, 2019, and monitoring ceased on August 2, 2019.

5. Through the course of the investigation, agents discovered that Cortez COLLINS dealt multiple ounces of heroin/fentanyl on a weekly basis, including to the Youngstown, Ohio and Sharon, Pennsylvania area.
6. As discussed below, agents have identified multiple members of the COLLINS DTO. These individuals include:
  - a. Cortez COLLINS, aka "Tez": COLLINS is a multi-ounce distributor of heroin and fentanyl in the Cleveland and Youngstown, Ohio, and Sharon, Pennsylvania, areas and a leader in the DTO.
  - b. Monte COLLINS, aka "Mook": Cortez COLLINS's brother; Monte COLLINS is a retail-level distributor of the DTO and has provided heroin to individuals (known as "testers") in order to test the quality of the product.
  - c. Lindsey CARTER: a sub-distributor for the DTO, dealing in user-level quantities of heroin.
  - d. Edward AUSTIN: a member of the DTO and a heroin supplier to COLLINS.
  - e. Chris JOHNSON: a retail-level distributor for the DTO.



f. Dashawn JONES: a provider of heroin adulterants  
(aka "cut") to the DTO.

g. Michael HORNBuckle, Jr.: a sub-distributor for  
the DTO who distributed the controlled substances  
provided by Cortez COLLINS.

7. On August 26, 2019, the Honorable Thomas J. Parker  
signed a search warrant authorizing the search of  
multiple locations discussed below, as well as the  
seizure of various items related to drug trafficking.

**MONTE COLLINS**

8. Monte COLLINS aided the conspiracy as a retail dealer  
of heroin, as well as by finding individuals to test  
the DTO's supply of heroin, as discussed below.

9. On July 6, 2019, Cortez COLLINS placed an outgoing  
call to Monte, which is transcribed below:

MONTE: Hello?

CORTEZ: [U/I], Mook?

[VOICE OVERLAP]

MONTE: What up? Huh?

CORTEZ: [U/I], what did say?

MONTE: Who?

CORTEZ: The, the lick (drug customer) you gave  
it to, Shon [PH].

MONTE: Oh, he s', oh he did say [U/I]... I was...



Six (6) (Shon said the quality was a '6' on a scale of 1-10).

CORTEZ: Huh?

MONTE: He said, I'm finna get... Yeah, he said he ain't like it. It was six (6).

CORTEZ: He didn't like it?

MONTE: Yup.

CORTEZ: Damn [PH]...

MONTE: Yeah, I say it test. I won't say the nothing I got back...

CORTEZ: He said like a six (6)?

[VOICE OVERLAP]

MONTE: But, I don't... Yeah, he said like a six (6). But that what he said, though. Try somebody else (see of anyone else may like it better).

10. The following day, MONTE again had the heroin tested, and called his brother to inform him:

CORTEZ: Hello?

MONTE: Yeah, I (u/I) with Skinny.

CORTEZ: What he say?

MONTE: He said it good, he said a eight (8) (8 on a scale of 1-10).

CORTEZ: Oh he did?

MONTE: Yeah he said it at least (U/I) as the shit I



got now, they both a eight. He like both. Like he  
(u/I)

CORTEZ: He shoot (injects heroin intravenously),  
don't he?

MONTE: Yeah, he do any. Like everything, I wouldn't  
put it past him.

CORTEZ: you said it's a eight?

MONTE: yeah, he said he like it.

11. On August 13, 2019, officers with Cleveland Police attempted to pull over a vehicle operated by Monte COLLINS. The vehicle did not respond immediately when the police cruiser initiated the traffic stop, and COLLINS could be observed moving about the car erratically. When the vehicle stopped and the officer made contact with COLLINS, a large amount of white and yellow powder could be observed on the floor of the vehicle, with a shoe imprint in it. Officers also located two paper folds containing yellow powder in them. Those powders are suspected to be heroin and/or fentanyl. COLLINS did not respond when asked what the substance in the vehicle was. COLLINS was also in possession of two cell phones and \$1224 in U.S. currency, which is conduct common to drug traffickers. COLLINS's phones and money were seized, and the vehicle



was impounded to allow for the material to be tested.

12. On August 27, 2019, agents conducted a document search warrant at 988 East 130<sup>th</sup> Street in Cleveland, Ohio. During the search, the occupant, Susie Wilkerson (who was identified as Monte and Cortez COLLINS' grandmother and is at times referred to by them as "Mommy"), gave consent to agents to search the residence for narcotics. Agents located approximately ¼ ounce (two "eight balls") of suspected heroin/fentanyl<sup>1</sup> on top of a cabinet in the kitchen, along with a digital scale.

13. On July 24, 2019, at approximately 5:14 PM, Cortez COLLINS placed an outgoing call to Monte COLLINS, which was intercepted through TT-1. The call begins with Cortez asking Monte where he is, to which Monte replies, "Mommy's house." This is a reference to 988 East 130<sup>th</sup> Street, Cleveland, Ohio. The call continued, and Cortez asked Monte, "Where'd you put the blender at, Mommy house?" to which Monte replied, "Nah, I got it put up in the basement stash." Affiant knows that blenders are often used to cut up and process heroin and fentanyl. The call continued with the following conversation:

MONTE: I, I ain't gonna get it yes, I gonna get it yet, cause' I ain't got no car. That why, uh, I was gonna go get, uh, the

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<sup>1</sup> Presumptive tests of these items did not yield any results.



bookbag. I was gonna go over there and grab that shit in a minute, but I (UNINTELLIGIBLE) though.

COLLINS: What um, where the yams (drugs) and stuff at?

MONTE: The yams at mommy house (988 East 130th Street).

COLLINS: You got mine over there too?

MONTE: Yup.  
[VOICES OVERLAP]

COLLINS: (UNINTELLIGIBLE)

MONTE: And that one shit, yeah, that one (UNINTELLIGIBLE) I grabbed that too. I grabbed that.

COLLINS: Gotta motherfuckin' gonna go get that blender real quick, man.

MONTE: Yeah (UNINTELLIGIBLE) I'll go and get it. It's put up though, I got it put up.

COLLINS: Yeah. I ain't driving my car over there.  
[VOICES OVERLAP]

MONTE: Yeah, I gotta use that...yeah, I need to use that thing anyway. Cause' I'm about to grab, I'm about to reup (resupply customers)

COLLINS: Yeah, I ain't driving my shit over there. Hell naw.

MONTE: Yeah, That was crazy, man.

COLLINS: Yeah.

Following this conversation, COLLINS agrees to drive Monte to back to the house to get in. At approximately 5:11PM, the ping location of Cortez COLLINS' telephone placed him in the vicinity of 988 East 130th Street, Cleveland, Ohio. Within 30 minutes, the location of Cortez COLLINS' telephone placed him at Monte COLLINS's residence.

14. Also on August 27, 2019, agents conducted a narcotics search warrant at 1049 Thornhill, Monte



COLLINS's residence. Agents located a bag that tested presumptively for mannitol, a common adulterant for heroin and fentanyl.

**LINDSEY CARTER**

15. LINDSEY CARTER has been identified as a customer of COLLINS who in turn distributes heroin at the user level. Below is a sampling of several calls in which COLLINS and CARTER discuss drug trafficking.

16. On June 22, 2019 at approximately 1:50 p.m., agents intercepted an outgoing call from COLLINS on TT-1 to CARTER at (216) 762-4593. The call is transcribed as follows:

CARTER: Hello?

COLLINS: What up, brother? What time you're going up there?

CARTER: What up, bro? Shit, I'm about to be on my way now. I'm on Superior uh, Euclid probably.

COLLINS: Aight, listen I'm just about to get it from you up there, that's cool?

CARTER: Yup.

COLLINS: Aight.

CARTER: How much do I owe you?

COLLINS: Uh, two twenty five (\$225).

CARTER: Aight.

COLLINS: Plus the ten (\$10) two thirty-five (\$235).



CARTER: Aight.

COLLINS: Aight.

17. On June 23, 2019, agents intercepted an outgoing call from COLLINS on TT-1 to CARTER. During the call, the following exchange took place:

COLLINS: Can you get that shit off, though?  
(can you sell the drugs?)

CARTER: Shit, I can try.

COLLINS: Shit, just give it—

CARTER: I'mma have to give it, like, deals on that shit tho'. (I'm going to have to sell it at a discounted price).

COLLINS: Yeah, just give me, just give me—

CARTER: So they (customers) won't complain.

COLLINS: Yeah, just give me thirty-five a G (\$35 a gram) for it until, 'til the other shit (more drugs) come in. Supposed to be comin' in tomorrow, though, for sure he (drug supplier) said. 'Cause that shit—

CARTER: A'ight.

COLLINS: But yeah, just give me like thirty-five a G (\$35 a gram) for that shit.

CARTER: A'ight.

18. On June 30, 2019, at approximately 5:03 p.m., COLLINS, using TT-1, placed an outgoing call to CARTER. The call is transcribed as follows:

CARTER: Hello?

COLLINS: Yeah, you, you said they, you said



they (drug customers) complainin'?

CARTER: Yeah, them niggas lightweight tweakin' out with me right now (the drug customers are upset).

COLLINS: Man, that's insane, I got that shit (those drugs) out the same bag (they should be the same quality), man, I dunno' what they, man.

CARTER: Yeah.

COLLINS: It's, you can tell them, you can look at it, it's the same [MUFFLED AUDIO] shit, I didn't do nothin' to it.

CARTER: Nah, I saw this dude, baby, and they, they definitely trippin' bruh', even the power play is trippin'.

COLLINS: How many people did you give it to?

CARTER: I got a nigga that come and buy a bar every day that's why I'm callin' you, bruh', and he, he flipped out on me.

COLLINS: How many did you, how many people did you give it to?

CARTER: Shit, him and another person, they both they flipped out.

COLLINS: How, a'right, how much did you sell? How many, how many, how many you got left?

CARTER: Shit, like, like I don't got the other scale bruh' to give you a correct number.

COLLINS: A'right, text me the number real quick so I can, you know what I'm sayin', so I can [U/I].

CARTER: A'right.

COLLINS: A'ight.



19. On August 13, 2019, agents were conducting surveillance of Lindsey CARTER at his residence of 1285 East 142<sup>nd</sup> Street in East Cleveland, Ohio. At approximately 12:30 PM, agents observed Coconspirator Chris JOHNSON's Cadillac pull onto the driveway of the residence and park in front of the house. Due to the window tint of JOHNSON's vehicle, agents were unable to verify at this point whether JOHNSON was the driver of the vehicle. However, JOHNSON's known phone was pinging consistent with that location. Agents observed CARTER exit the residence and approach the driver's door of JOHNSON's vehicle. Shortly thereafter, CARTER went back into the residence and exited for the second time with his hand inside his pocket. Upon approaching JOHNSON's passenger side of the vehicle, CARTER took his hand out of his pocket and it appeared CARTER placed something in JOHNSON's vehicle. CARTER went back inside the residence and JOHNSON began to leave the area. Mobile surveillance began of JOHNSON and agents observed JOHNSON park the aforementioned Cadillac in front of 10900 Olivet and meet with an unidentified male for a short duration. JOHNSON left the area after a short period of time. Based on training and experience, Affiant believes



that CARTER conducted a drug transaction with the driver of JOHNSON's vehicle, who subsequently redistributed the heroin to another customer.

20. On August 27, 2019 agents executed a narcotics search warrant at CARTER'S residence located at 1285 East 142<sup>nd</sup> Street in East Cleveland, Ohio. CARTER was not present in the house and his girlfriend informed agents that CARTER was in the hospital. Agents located two cellular phones and a small bag of powder which tested tentatively for Benadryl, a common adulterant for heroin and fentanyl.

**EDWARD AUSTIN**

21. Edward AUSTIN has been identified as a high-ranking member of the DTO. As demonstrated by the calls below, I believe that AUSTIN has been serving as a multi-ounce supplier of heroin to COLLINS.
22. On July 1, 2019, agents intercepted the following call from AUSTIN to COLLINS over TT-1:

COLLINS:       What's up with it, baby?

AUSTIN:        What's up, nigga, where you at?

COLLINS:       Shit, I'm out the way right now.

AUSTIN:        Swear, whatchu' wanna get into?

COLLINS:       Shit, chillin'. Fuck you into?

AUSTIN:        Shit, at the spot.



COLLINS: Hey!

AUSTIN: Huh?

COLLINS: I gotta holler at you too, man.  
I'mma, I'mma call you.

AUSTIN: About what?

COLLINS: I'm abouta' call you as soon as I  
get in the whip, a'right?

AUSTIN: What it's about, some crazy shit?

COLLINS: Naw, hell naw. Um . . . yams  
(drugs).

AUSTIN: Oh, yeah, I got some if you wanna  
grab 'em but just—

COLLINS: That's what I'm, yeah, that's what  
I'm sayin'. I'll call you as soon as I get in  
the whip (car).

AUSTIN: A'right. [MUFFLED] A'right, man,  
but call me tho', nigga.

COLLINS: A'right.

AUSTIN: A'right.

23. On July 3, at approximately 11:12 a.m., COLLINS  
received a call on TT-1 from AUSTIN. During the call  
the following exchange took place:

COLLINS: Solo? Solo. I'm about to uh . .  
. W', what house you at? West side?

AUSTIN: Hell yeah, yup.

COLLINS: Alright. I'm about to, uh, when I  
drop my auntie off, I'mma, I'mma, I'mma come  
grab some shit (heroin). Cool?



AUSTIN: Hey...

COLLINS: Huh? I'm about to shoot down there. [PAUSE] You heard me?

AUSTIN: Yeah. Yeah, where you . . . . Hey. Where you at right now?

COLLINS: Huh? I'm at uh, Walmart. At, uh, Warrensville [PH].

AUSTIN: A'ight, call me.

COLLINS: I [U/I] up my auntie. I'm call you, alright?

AUSTIN: Alright, 'cause listen, man. I got some shit on St. Clair. At the [U/I] spot. I got [U/I] and you can grab it.

COLLINS: A'ight, how many there?

AUSTIN: A'ight. Huh?

COLLINS: How many, How many you got there?

AUSTIN: Fifty (50 grams).

COLLINS: A'ight, bet.

AUSTIN: Okay.

COLLINS: A'ight.

24. Following the call above, Cortez COLLINS made calls to a heroin customer in the Sharon, Pennsylvania area to confirm an order for heroin. Cortez COLLINS also made calls to Tierra Jones and Gregory Wynn in order to arrange for an Uber ride. Location data on TT-1 indicated that it travelled to the Sharon, Pennsylvania, area, and then back to Cleveland, on



the evening of July 3.

25. On July 11, 2019, agents intercepted a call from AUSTIN to COLLINS on TT-1. During the call the following exchange was made:

AUSTIN: Shit... But I got some more shit (drugs), I need you to dump off for me.

COLLINS: Is it fire (strong heroin) though, bruh? [U/I].

AUSTIN: Nigga, what he say about that last shit I just gave you (what did your customers think about the last supply of heroin)?

[VOICE OVERLAP THROUGHOUT CALL]

COLLINS: That... That last shit... I mean is cool. [U/I]... For the (Sharon) PA niggas, you gonna have to, you know? Remember, I already told you.

AUSTIN: Oh, yeah them... Oh, so you need some fire for them niggas?

COLLINS: Yeah, I though you, you talkin' about for them or my peoples (local heroin customers)? I give my peoples the other shit. He said it...

AUSTIN: They may like that shit?

COLLINS: Yeah, he said he like it, but...



You know you can't do nothin' to it (cannot "cut" it in order to increase quantity). He said he like it, but I [U/I]... He talkin' about the PA niggas, just gonna have to be able to take it (sell it "as is" without cutting it).

AUSTIN: How much you charging on that shit?

COLLINS: Uh... I just make like twenty (20) dollars a "G" (gram), of a "G" of... Charging seventy (70).

AUSTIN: How much you ch'... [LAUGHS]

COLLINS: But, shit. Is fire, though. He just can't, can't hit it. And I gave it to him.

AUSTIN: Man... This nigga. You been taxing the fuck out these niggas.

COLLINS: I tossed to him.

AUSTIN: Swear [PH]...

COLLINS: Yeah, he ain't give me nothin'.

AUSTIN: That nigga is cool (a reliable customer), though?

COLLINS: Yeah, he's my peoples. Shit.

AUSTIN: That nigga good money?

COLLINS: Yeah, he tryin' to try that.



Yeah. He [U/I] my peoples.

AUSTIN: Oh, oh... [U/I] just stay home?

COLLINS: Speedy (Marvin MARLOW) [PH].

Yeah, Speedy [PH]. Yeah, yup. Now his niggas gave him some players (other drug customers) and shit...

AUSTIN: Oh...

COLLINS: Yeah. Hell, yeah. So, shit. I have to make something off of it, shit...

AUSTIN: Right. Oh, you already know. So that, so that nigga ain't gon' do no fortune [PH]? Is he?

COLLINS: Hell, no.

AUSTIN: Oh...

COLLINS: Me with that nigga every day. Hell, no.

AUSTIN: Oh... Where you at, Mook (Monte COLLINS') [PH] house?

COLLINS: No, uh... I'm at uh...

AUSTIN: Oh, oh, you did say you out the way.

COLLINS: Warrensville [PH]. I'm in Warrensville [PH].

AUSTIN: Alright, though nigga.



COLLINS: I'm on my way down here. You got some shit (heroin), though?

AUSTIN: Hell, yeah.

COLLINS: Different shit. Take the one?

AUSTIN: No, hell no. I did, I do this shit right now. About to have some soon.

COLLINS: Oh, okay. What you got now? The same shit?

AUSTIN: Yup.

COLLINS: Oh, okay, okay.

AUSTIN: Shit, yeah I got forty-four (44) grams.

COLLINS: Huh?

AUSTIN: I got forty-four (44) grams. I was trying to dump real quick.

COLLINS: Forty-four (44)?

AUSTIN: Mm-hum.

26. On July 24, 2019, agents intercepted a call between AUSTIN and COLLINS during which COLLINS complained about the quality of the heroin that they were receiving:

COLLINS: I'm abouta' uh, he abouta', I'm abouta' give you a band (\$1000). Then two (2) more bands on Saturday.



[VOICES OVERLAP]

AUSTIN: Yeah, I'm abouta' do it [U/I]  
'cause I need to grab some more yams (drugs)  
from that nigga, said he got some thunder (high  
quality drugs).

[VOICES OVERLAP]

COLLINS: [U/I], I ain't even. Man... that  
shit bro', I don't, that shit [U/I] we gonna  
have to find a difference source though, bruh'.  
I ain't even gonna lie to you. That shit,  
ain't that shit, it's cool tho', but it ain't  
[U/I] (It's of fair quality (cool) but is not  
good enough).

[VOICES OVERLAP]

AUSTIN: Right, a nigga need some gas gas.

27. On August 27, 2019 agents executed a document search warrant at 2261 East 73<sup>rd</sup> Street in Cleveland, Ohio, AUSTIN's main residence. AUSTIN volunteered to agents that a gun and crack cocaine were located in the house. In the bedroom AUSTIN shared with his girlfriend, agents located a Glock handgun (which is manufactured outside the State of Ohio) with an extended magazine, a quantity of suspected cocaine base (crack) and two digital scales.



28. On September 28, 2011, AUSTIN was convicted of trafficking offenses in Cuyahoga County and sentenced to 18 months confinement. On February 8, 2018 AUSTIN was convicted of felony burglary in Cuyahoga County and sentenced to 1 year confinement.

**Chris JOHNSON**

29. Chris JOHNSON was also identified as a member of the DTO. As explained below, JOHNSON, CORTEZ COLLINS and MONTE COLLINS would supply each other with heroin.

30. On July 18, 2019, COLLINS placed an outgoing call to JOHNSON:

JOHNSON: Forgot to leave that shit (drugs) in the garage.

COLLINS: Oh, you did? I'm in the garage lookin'. I'm like, 'this nigga, man, I'm 'bouta'—

[VOICES OVERLAP]

JOHNSON: Hell yeah, I forgot, I'm at Daylyn [PH] practice, tho'. Soon as I leave, I'mma call you.

COLLINS: A'right, bet, just put it in the garage. Tell me, before you get back.

JOHNSON: A'ight.



COLLINS: A'right.

31. Later the same day, COLLINS received an incoming call from JOHNSON:

COLLINS: Hello? [ASIDE: Hold on.]

JOHNSON: Where you at?

COLLINS: Shit, put it in the garage for me.

JOHNSON: Huh?

COLLINS: Put it in the garage for me.

JOHNSON: I ain't even there, that's why I was askin'.

[VOICES OVERLAP]

COLLINS: Oh, you ain't? Oh, shit, I'm a minute away. I'm out the way.

JOHNSON: Oh, a'right, I'mma, well I'm on my way down there, that's why I'm [U/I].

COLLINS: A'right, bet.

JOHNSON: A'ight.

During the calls above, I believe that COLLINS was telling JOHNSON to put a quantity of drugs into the garage of a location where COLLINS could then access them.

32. On July 20, 2019, COLLINS placed an outgoing call to JOHNSON and made the following exchange:

JOHNSON: What the fuck, what's this about



the seven (7) with Mook (Monte COLLINS)? What he talkin' about?

COLLINS: Oh, I no, I bought seven (7) (seven grams of heroin) from him, I'm like, 'shit, just buy it back from Chris (JOHNSON)'. I'm talkin' 'bout shit, 'just buy it back from Chris, he can give it to you'.

JOHNSON: Why you ain't, why you ain't tell me that? [ASIDE: Ah!]

COLLINS: Huh?

JOHNSON: Why you ain't tell me? He talkin' 'bout he told, he said you already know.

COLLINS: Oh, I told, I said 'tell', I'm like, 'man, tell him you gonna buy seven (7) back. I'm 'bouta get seven (7) from you real quick before I go outta town. I gotta move'. I'm like, 'shit—

[VOICES OVERLAP]

JOHNSON: Oh.

COLLINS: -just get it back from him. He'll sell you the seven (7) grams'. You know what I'm sayin'?

JOHNSON: A'right.

33. JOHNSON and CARTER also supplied each other with



heroin. On or about July 14, 2019 CARTER was witness to a homicide. As a result, he turned over two cellular phones to Cleveland police and consented to their search. One phone revealed multiple text messages with JOHNSON that I believe to be drug related:

- a. On June 7, 2019, JOHNSON, who is stored in CARTER's phone as "EC Chris" with the same telephone number Agents had previously identified for JOHNSON, text messaged CARTER "I'm ready for you". CARTER responded "Call me." CARTER responded with "8" to which JOHNSON replies "k" and "FT me". I believe that JOHNSON was informing CARTER that he was ready to supply him with heroin, and CARTER in turn requested eight (8) grams.
- b. On June 13, 2019, CARTER sent JOHNSON a text stating "I'm ready for you" to which JOHNSON replied "okay here I come." CARTER replied with "okay same place." I know that drug traffickers often conduct transaction in familiar places in order to avoid detection by law enforcement. I believe that CARTER was arranging a drug transaction with JOHNSON and JOHNSON agreed to



meet at a place where they had previously met with CARTER.

c. On June 30, 2019, CARTER sent a text message to JOHNSON stating "30" followed by "if you can change the color." JOHNSON replied "I got you, Im 5 minutes away." I believe that CARTER was requesting 30 grams of heroin from JOHNSON, but wanted a different batch (color) from what he previously had received.

d. On July 12, 2019, JOHNSON sent CARTER a text message stating "you don't need me to swap do you?" (get you a different batch of heroin) to which CARTER responds "naw, everything cool, they ain't clappin'" (the drug customers are not complaining).

34. As discussed above, on August 13, 2019, S/As were conducting surveillance of Lindsey CARTER. At approximately 12:30 PM, Agents observed JOHNSON's Cadillac pull onto 1285 East 142<sup>nd</sup> Street. Agents observed CARTER exit the residence and approach the driver's door of JOHNSON's vehicle. Though agents did not identify JOHNSON due to the window tint, Johnson's phone was signaling that it was in the same location. Therefore, it is believed the driver was JOHNSON.



Shortly thereafter, CARTER went back into the residence and exited for the second time with his hand inside his pocket. Upon approaching JOHNSON's passenger side of the vehicle, CARTER took his hand out of his pocket and it appeared CARTER placed something in JOHNSON's vehicle. Mobile surveillance began of JOHNSON and agents observed JOHNSON park the aforementioned Cadillac in front of 10900 Olivet and meet with an unidentified male for a short duration. JOHNSON left the area after a short period of time. Based on training and experience, Affiant believes that CARTER conducted a drug transaction with JOHNSON.

35. On August 15, 2019, S/As placed a court-authorized tracker on JOHNSON's vehicle. Since placing the tracking device on JOHNSON's vehicle, and through the use of ping location of JOHNSON's telephone, JOHNSON has been observed at CARTER's residence on the following dates: August 15, 2019; August 16, 2019 (on two different occasions); August 19, 2019 (on two different occasions); and August 21, 2019. Additionally, on August 15, 2019, agents received notification, through the ping location of JOHNSON's telephone and the location of the tracking device, that JOHNSON arrived at CARTER's residence for



a short duration of time. Within five minutes, JOHNSON left and went to 13806 Kelso Avenue in Cleveland Ohio. JOHNSON remained at that residence only for a short period of time before going to his residence. JOHNSON remained at his residence until approximately 12:28 AM when he returned to CARTER's residence. JOHNSON did not return home until after 3AM. Based on this information, Affiant believes that JOHNSON left his residence and went to CARTER's residence to obtain drugs to sell.

36. On August 16, 2019, Agents noticed (through tracking) JOHNSON's vehicle leaving the location of his residence and travel directly in the direction of Kelso Avenue in Cleveland. TFO Kopchak arrived on Kelso and observed JOHNSON park in the street, and an unidentified black male approach JOHNSON's vehicle. TFO Kopchak observed a suspected hand to hand transaction between JOHNSON and the unidentified male. Within a matter of minutes both vehicles had departed the area. Due to not having a marked unit within the area a traffic stop did not occur. S/A Penfield monitored the ping location of JOHNSON's telephone and observed his telephone and vehicle return to JOHNSON's residence.



37. On August 27, 2019, agents conducted a search warrant at JOHNSON'S residence at 4054 Harwood Road in South Euclid, Ohio. Agents located a hydraulic press, respirator masks, and a blender with residue. Based on my training and experience, I know that these items are common tools for the processing of heroin/fentanyl for distribution.

**DASHAWN JONES**

38. Dashawn JONES has been identified as an individual that provides the DTO with supplies including heroin adulterants, specifically a substance known as "rizzy." Affiant knows that rizzy is a material originally manufactured for use in dying flowers in floral arrangements. However, rizzy has recently been found in seized heroin.

39. On July 1, 2019, agents intercepted the following call between Cortez COLLINS and Dashawn JONES:

D. JONES: Hello?

COLLINS: You're driving, bro?

D. JONES: Hello?

COLLINS: Huh?

D. JONES: Hello?

COLLINS: You driving?

D. JONES: Mmm.



COLLINS: You said, you is?

D. JONES: Yeah.

COLLINS: Shit, can you pull up at my brother's house then? [CAR CHIMES IN THE BACKGROUND] And Imma have the nigga give you the money for that shit real quick, 'cause I been trying to come [U/I]. I'm trying to catch him before he go to work.

D. JONES: Alright, where does your brother live?

COLLINS: Uh, ten forty (1040)... he live on Thornhill.

D. JONES: Thornhill?

COLLINS: You know where Thornhill at, on the Clair (Off of St. Clair Avenue)?

D. JONES: Yeah, uh, text me the address.

COLLINS: Alright, bet.

D. JONES: Alright.

40. Immediately following the call above, Cortez COLLINS called his brother, Monte:

MONTE: Hello?

CORTEZ: What up, nigga you asleep?

MONTE: Hell yeah.

CORTEZ: This nigga, uh, this nigga Frank want



me to grab some shit from him, to throw you.

MONTE: Oh, alright

[VOICES OVERLAP]

CORTEZ: I'm about to, I'm about to grab some.

MONTE: Alright

CORTEZ: I'm gonna bring it down, I'm about to grab that shit, I'm gonna come down there in a minute though.

MONTE: Alright

[VOICES OVERLAP]

CORTEZ: You gonna be up?

MONTE: Yeah.

CORTEZ: Alright. Hey! I need you to do me a favor, too.

MONTE: Yeah?

CORTEZ: Uh, my nigga about to, my nigga who be selling the, um, rizzy about to pull over there. Shit just give that nigga the um, give that nigga forty dollars for me, I'm gonna get you when I bring your shit down there.

MONTE: Alright

CORTEZ: Alright.

Following this call, agents established surveillance in the area of 1049 Thornhill, the



known residence of Monte COLLINS. Agents observed a black male with dreadlocks, later identified as JONES, in a white Dodge outside of the residence.

41. On July 14, 2019, agents intercepted a call from COLLINS to JONES. After the parties greeted, the following exchange took place:

COLLINS: Shit, you at work?

D. JONES: Hell, yeah.

COLLINS: What time you get off?

D. JONES: Uh, seven (7:00).

COLLINS: A'ight, shit. You got s', what all, what all colors you got?

D. JONES: Uh... On what? What you? Quan (Quanine) [PH] or Rizz (Rizzy) [PH]?

COLLINS: On a Rizz [PH].

D. JONES: Uh, tan... Gray... And pink.

COLLINS: Tan, gray and pink?

D. JONES: Yeah. I had to go back up to the shop because [U/I] tomorrow.

COLLINS: Alright, um... I can't meet your girl, huh?

D. JONES: Uh... She uh, hell no. She ain't got shit in the car.

[VOICE OVERLAP]



COLLINS: Huh?

D. JONES: [U/I] That shit at my house, for real. She ain't even got that shit in the car.

COLLINS: Oh, she don't?

D. JONES: Hell, no...

[VOICE OVERLAP]

COLLINS: You can, what, what time you'll have 'em ready... If you off at seven (7:00).

D. JONES: And I, oh you [U/I], no. I think I got... White one, too.

COLLINS: A'ight, let me get the white ones. So, shit. When you get off, what time do you be ready, you think?

D. JONES: Uh, I be... Shit, I have to go at my house like at around... Shit, seven, thirty (7:30).

COLLINS: A'ight, bet. Call me as soon as you...

[VOICE OVERLAP]

FRANK: I let you, alright...

42. Since the initiation of this investigation, agents have also discovered that JONES was encountered by Cleveland Police on July 8, 2019, during which he was found to be in possession of pink rizzy. Police were



responding to a complaint about drug activity and drinking in a downtown parking lot when JONES spotted coming from the familiar Dodge Avenger observed on July 1. Jones also provided the phone number that agents had intercepted in conversation with COLLINS. JONES was found to have an open contempt of court warrant, for which he was arrested without incident. During an inventory of his vehicle, a bag of pink rizzy was found; JONES claimed it to be a workout supplement.

43. On August 27, 2019 agents conducted a search warrant at JONES' residence of 16201A Lakeshore Boulevard, Apartment 326 in Cleveland, Ohio. During the search agents located a paper bag in JONES' bedroom. Inside the bag were 11 envelopes containing colored powder. Seven of the envelopes were labeled: three with "Blue R;" one with "Tan Q;" one "white rizzy" one with "B R;" and one with "Tan Rizzy." Each of these envelopes contained a powdery substance. Based on my training and experience, and the evidence gathered in this case, I believe these envelopes to contain at least Rizzy and Quinine, common adulterants for heroin and fentanyl.

44. In an interview on August 27, 2019, JONES



acknowledged that the substances he was providing were likely being used to cut narcotics.

**MICHAEL HORNBuckle**

45. On July 14, 2019, agents conducted surveillance of Cortez COLLINS due to a call being intercepted over TT-1 indicating that Cortez COLLINS was going to meet with a then unidentified male to supply him with additional narcotics prior to Cortez COLLINS getting ready to leave town. Cortez COLLINS informed the male he did not want him to "run dry" while he was gone. Therefore, agents began surveillance of Cortez COLLINS in Cleveland, Ohio, and followed Cortez COLLINS to Youngstown, Ohio. Upon arrival into Youngstown, Ohio, Cortez COLLINS contacted the unknown male at the same telephone number and was instructed to meet with the male at McBride and Woodcrest. The unknown male called Cortez COLLINS to advise him he was arriving in a black Dodge Ram truck. Shortly thereafter, Agents observed a black Dodge Ram bearing Ohio license plate PKQ4047 arrive and park behind Cortez COLLINS. Cortez COLLINS got into the truck and within a short time period got back into the driver's seat of his rental vehicle. Affiant believes, based on the intercepted conversations prior to this interaction, as well as



Affiant's training and experience, that COLLINS supplied the occupant of the vehicle with drugs during this interaction. S/A Penfield determined the Dodge Ram truck was a rental vehicle through Hertz. Upon further investigation, it was determined the aforementioned Dodge Ram was rented by Michael HORNBUCKLE. Cortez COLLINS has several calls which were intercepted through TT-1 with HORNBUCKLE's telephone number.

46. On August 19, 2019, at approximately 9:58 AM., agents with ATF Youngstown established surveillance at HORNBUCKLE'S residence of 444 Sunshine Avenue in Youngstown, Ohio. Upon their arrival, agents observed HORNBUCKLE in a blue t-shirt sitting on the front porch of the residence. At approximately 9:59 AM., agents observed a white Mercury SUV, operated by a white male, park across the street from the residence. The white male exited the SUV and approached HORNBUCKLE sitting on the front porch. Agents then observed the two individuals conduct a hand-to-hand transaction. After their hands met, the white male turned around and walked towards his vehicle. He waved over his shoulder as he walked back to the white SUV. HORNBUCKLE stayed on the front porch. The



white male re-entered the SUV and departed northbound on Sunshine Avenue. The Mercury SUV had Ohio temporary license plate, J512069, which was registered to Wendy Harshbarger and registered at 188 Johnson Road, W Middle Sex, Pennsylvania. After approximately one minute, HORNBuckle went back into the residence.

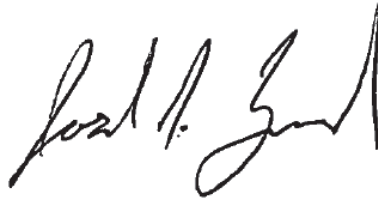
47. On August 27, 2019 agents executed a narcotics search warrant at 444 Sunshine Avenue in Youngstown, Ohio. During the search, agents located several quantities of drugs and adulterants. Several bags of suspected heroin adulterant such as acetaminophen and mannitol were located, as well as a quantity of a substance that tested positive for cocaine base (weighing 44 grams including packaging and evidence bag). Agents also located and an undetermined amount of U.S. currency and three firearms. HORNBuckle made statements to agents expressing that the drugs belonged to him.

#### **CONCLUSION**

48. Based upon the above listed facts and circumstances, Your Affiant has probable cause to believe, and does believe that Cortez COLLINS, Monte COLLINS, Edward AUSTIN, Lindsey CARTER, Chris JOHNSON, Michael HORNBuckle and Dashawn JONES did in the Northern




District of Ohio, Eastern Division, knowingly and intentionally conspire to distribute controlled substances, in violation of Title 21, United States Code, Section 846 (a)(1) and 841(a)(1) and that Edward AUSTIN, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting commerce a firearm. Your Affiant requests that Arrest Warrants be issued for Cortez COLLINS, Monte COLLINS, Edward AUSTIN, Lindsey CARTER, Chris JOHNSON, Dashawn JONES and Michael HORNBuckle.



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Joseph J. Zevchek  
Special Agent  
Drug Enforcement Administration

This affidavit was sworn by the Affiant on this 27th day of August, 2019 by telephone after submission by reliable electronic means, per Fed. R. Crim. P. 4.1.



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WILLIAM H. BAUGHMAN, JR.  
United States Magistrate Judge  
Northern District of Ohio  
Eastern Division